

**Clerk of the Authority**  
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**Chief IFC Officer**  
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Marine Management Organisation  
PO Box 1275  
Newcastle upon Tyne  
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Your ref: MLA/2025/00263

Date: 02/07/2025

Dear Whomever this may concern,

**Re: Tees and Hartlepool Maintenance Dredge Disposal**

Thank you for the opportunity to comment on the above proposal. North Eastern Inshore Fisheries and Conservation Authority (NEIFCA) Officers have considered the information presented in the application, under provisions set out in the Marine and Coastal Access Act 2009, whereby IFCA's are responsible for the sustainable management of inshore sea fisheries resources and the marine environment within their jurisdictional area. We do not generally anticipate any significant adverse effects resulting from maintenance dredging in the River Tees or the disposal of dredged material. However, we are concerned about the elevated levels of BDE209, BDE99, and BDE100 at some of the sites. While we acknowledge that, in the absence of Total Organic Carbon (TOC) data, PBDE results cannot be normalized, we strongly recommend re-testing these sites with the TOC analysis prior to the issuance of a new licence. Furthermore, we recommend exploring alternative disposal methods for these sites should contaminant levels be found to exceed acceptable thresholds.

Yours sincerely

p.p. Ralf Bublitz  
Environmental and Scientific Manager  
North Eastern Inshore Fisheries and Conservation Authority  
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